

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

APPOTRONICS CORPORATION LTD.,

Plaintiff,

v.

DELTA ELECTRONICS, INC.,

Defendant.

Civil Action No. 2:19-cv-00466-RGD-LRL

**EMERGENCY MOTION OF DEFENDANT DELTA ELECTRONICS INC. TO STAY  
THE CASE DUE TO CORONAVIRUS OUTBREAK**

Defendant Delta Electronics, Inc. (õDeltaö) respectfully moves on an emergency basis for an order staying this action because of the worldwide pandemic caused by the Coronavirus Disease (COVID-19) and until the release of governmentally imposed restrictions due to the Coronavirus outbreak. For the reasons stated in the supporting Memorandum, Delta specifically proposes that this Court order that the parties complete document production and interrogatory supplementation by April 14, 2020, that the April 27, 2020 hearing on Delta's pending Motion to Transfer (Dkt. 30) proceed, but that the case otherwise is stayed pending the lifting of travel and other restrictions that would allow deposition discovery to commence. In the alternative, Delta respectfully moves that this Court extend by at least three months all remaining case deadlines (subject to the Court's convenience for hearings, conferences, and trial) in the Court's Rule 16(b) Scheduling Order (Dkt. 34).

Dated: March 20, 2020

Respectfully submitted,

By: /s/ Frank A. Edgar, Jr.

Frank A. Edgar, Jr., Esq. (VA Bar No. 36833)  
GOLDSTEIN, EDGAR & REAGAN  
741 J Clyde Morris Boulevard  
Newport News, VA 23601  
Telephone: (757) 873-8773  
Facsimile: (757) 873-8713  
Email: faedgarjr@ibglaw.com

Benjamin L. Kiersz (VA Bar No. 47043)  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
1650 Tysons Boulevard, Suite 1400  
McLean, VA 22102  
Telephone: 703.770.7900  
Email: Benjamin.kiersz@pillsburylaw.com

Christopher Kao (*pro hac vice*)  
christopher.kao@pillsburylaw.com  
David J. Tsai (*pro hac vice*)  
david.tsai@pillsburylaw.com  
Brock S. Weber (*pro hac vice*)  
brock.weber@pillsburylaw.com  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
4 Embarcadero Center, 22<sup>nd</sup> Floor  
San Francisco, CA 94111  
Telephone: 415.983.1000

*Counsel for Defendant*  
*Delta Electronics, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 20, 2020, the foregoing document was electronically filed with the Clerk of the Court for the UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF VIRGINIA, using Court's Electronic Case Filing (ECF) system. The ECF system routinely sends a "Notice of Electronic Filing" to all counsel of record who have consented to accept this notice as service of this document by electronic means. Any party not receiving the Court's electronic notification will be sent a copy of the foregoing document.

Dated: March 20, 2020

By: /s/ Frank A. Edgar, Jr.  
Frank A. Edgar, Jr., Esq.

*Counsel for Defendant  
Delta Electronics, Inc.*